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November 6, 2001

Magalie Roman. Salas Secretary Federal Communications Commission 445 Twelfth Street, S.W., TW-A325 Washington, D.C. 20554

Re: Erratum for WT Docket No. 01-146



Dear Ms. Salas:

BOSTON

DALLAS

DELAWARE

NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

Enclosed please find page 3 of the Comments of Pacific Crest Corporation filed on October 12, 2001 in the above-referenced docket. This corrected page contains a clearer version of Figure 1, which was distorted in the scanning process of the original filing.

Sincerely,

Robert J. Ungar

Enclosure

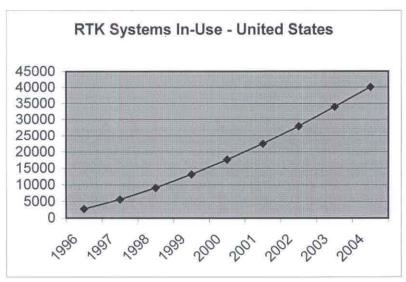


Figure 1

The Benefits of RTK Services

In addition to its obvious utility for precision land surveying activities, RTK technology is also employed in a growing number of other important applications both in the U.S. and elsewhere. RTK technology is used to design and maintain flood control facilities and measure groundwater; survey contaminated areas where traditional surveying methods would be hazardous; survey the precise location of hazardous materials; monitor the condition of bridges to measure deflection and deformation in order to assure continuing bridge safety; and to monitor crustal movements preceding earthquakes. RTK technology is also used to determine precise locations for mining explosives, measure water vapor for more accurate weather forecasting and precisely determine beachfront erosion. Thus the marriage of GPS and RTK technology has made possible precision location and measurement tasks previously not possible or requiring great expense.

The Need for Additional Radio Spectrum

As might be expected, the present secondary operation on voice priority frequencies by RTK systems is problematic, both to the primary channel licensee and the secondary RTK user. Further, given the growing applications for RTK technology, and the growing number of RTK system users, the small amount of spectrum used by the RTK industry is rapidly becoming inadequate to meet industry needs. In short, RTK technology needs, if not a home, certainly additional frequencies to meet expected demand.

Most Part 90 frequencies are not available to solve the problems unique to industries that need to transmit highly accurate positioning data on constantly varying sites. Individual site licensing would be an expensive and cumbersome process for